

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
MIDLAND-ODESSA DIVISION**

JENNIFER VETRANO,
Plaintiff,

v.

JOHN BRDA, ALLISON CHRISTILAW,
MBA, ICD.D B, JOHN R. HARDING, UZI
SASSON, DAN EATON ESQ, MAURICE
GUITTON, ERIC M. LESLIE, PHILIPPE
MORALI, KEN HANNAH, STEEN
KARSBO, JOHN DOES 1-20, JANE DOES 1-
20,
Defendants.

CASE NO. 7:24-CV-00325-DC-RCG

**RESPONSE TO PLAINTIFF'S
MOTION FOR ALTERNATIVE SERVICE**

Plaintiff's Motion for Alternative Service Under Federal Rule of Civil Procedure 4(e) ("Motion") is unwarranted. The undersigned counsel has communicated with Ms. Vetrano that he will be Dan Eaton's counsel with respect to this lawsuit (a point that Mr. Eaton confirmed with her). As the attached **Exhibit A** shows, the undersigned counsel offered to immediately accept service on behalf of Mr. Eaton and file an answer, response, or otherwise plead within twenty-one days. Ms. Vetrano rejected that offer.

The undersigned counsel is authorized to accept service on behalf of Mr. Eaton. The undersigned counsel would simply ask that the Court determine a date by which Mr. Eaton is deemed served and provide him the traditional twenty-one days to respond. Like Messrs. Sasson and Morali, Plaintiff is attempting to assert derivative claims against Mr. Eaton for the time period he was Meta Materials' General Counsel (all of which was after the alleged wrongdoing occurred) and he is not subject to personal jurisdiction in Texas. As such, he will be filing a Rule 12 motion

to dismiss and requests the traditional response time to prepare it.

As for Ms. Vetrano's rhetoric about bad faith, we disagree, but it is not relevant to her Motion for Alternative Service, and, as such, we do not respond. We reserve all rights though should it be necessary to respond in the future.

Dated: March 31, 2025

Respectfully submitted,

/s/ John R. Hardin

John R. Hardin

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Attorney for Defendant

DAN EATON ESQ.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing has been served upon all counsel of record via e-filing through the Court's CM/ECF portal on March 31, 2025.

/s/ John R. Hardin

John R. Hardin